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February 19, 2015

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Absolute Home Phones, Inc., Absolute Home Phones, Inc. dba Absolute Mobile and Absolute Mobile, Inc. Revised Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On April 5, 2012, Absolute Home Phones, Inc., Absolute Home Phones, Inc. dba Absolute Mobile and Absolute Mobile, Inc. ("Absolute") submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ On May 23, 2012 and August 10, 2012 Absolute revised its Compliance Plan to provide additional details and clarifications.

Due to the passage of time, Absolute has comprehensively revised its Compliance Plan. Absolute hereby re-submits its complete Compliance Plan with significant revisions.

¹

See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

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This letter and revised Compliance Plan are being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

*Counsel to Absolute Home Phones, Inc. and
Absolute Mobile, Inc.*

cc: Ryan Palmer
Jonathan Lechter

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Absolute Home Phones, Inc. dba Absolute Mobile Absolute Mobile, Inc.	

**ABSOLUTE HOME PHONES, INC., ABSOLUTE HOME PHONES, INC. DBA ABSOLUTE
MOBILE, AND ABSOLUTE MOBILE, INC. COMPLIANCE PLAN**

Absolute Home Phones, Inc., dba Absolute Mobile, and Absolute Mobile, Inc.
(“Absolute,” the “Company” or the “Companies”),¹ through their undersigned counsel,
hereby respectfully submit and request expeditious treatment of their Compliance Plan

¹ The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Absolute Mobile (dba) and Absolute Mobile, Inc. Absolute Home Phones, Inc. uses the Absolute Mobile dba to provide wireless service in Arkansas and Nevada. Absolute Mobile, Inc. provides wireless service in Puerto Rico. The Companies are affiliated through common ownership with several eligible telecommunications carriers (“ETCs”): Easy Telephone Services Company dba Easy Wireless; Assurance Home Phone Services, Inc. dba Surety Wireless; and Safari Communications, Inc. Easy is designated as an ETC in Arkansas, Missouri, Kentucky and Oklahoma. Surety Wireless is a wireless ETC designated in Arkansas, Maryland and Missouri. Safari Communications was a wireless ETC designated in Maryland, but the ETC is withdrawing its compliance plan and exiting the Lifeline business. Safari Communications surrendered its ETC designation as of November 2014. Absolute is also affiliated through common ownership with a Mobile Virtual Network Enabler (“MVNE”), Telecom Service Bureau, Inc. (“TSB”), which is not an ETC. Absolute’s other non-ETC affiliates are G5 Real Estate Holdings, LLC; High Tech Communications, Inc.; Mobile Management, Inc.; Pay It Forward Consulting, LLC and BreakOut Wireless, LLC.

outlining the measures they will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.²

The Companies commend the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Absolute will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier ("ETC") in the Lifeline program.³

Absolute will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission's Lifeline rules and policies more generally.⁴

This Compliance Plan describes the specific measures that the Companies intend to

² See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) ("*Lifeline Reform Order*"). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

³ See *Lifeline Reform Order*, ¶ 368. Although Absolute qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Absolute will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income Fund, including in any state where the public utilities commission determines that Absolute provides service using its own facilities for purposes of a state universal service program.

⁴ In addition, this Compliance Plan is comparable to the compliance plans approved by the Bureau, including two of the most recently approved compliance plans. See *Telrite Corporation Compliance Plan*, WC Docket Nos. 09-197, 11-42 (Dec. 19, 2012) and *Blue Jay Wireless, LLC Compliance Plan*, WC Docket Nos. 09-197, 11-42 (Dec. 19, 2012). The Telrite and Blue Jay Wireless compliance plans were approved on December 26, 2012. See Public Notice, DA 12-2063.

implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that Absolute will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Companies follow in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how the Companies offer Lifeline services, the geographic areas in which they offer services, and a detailed description of the Companies' Lifeline service plan offerings.

ACCESS TO 911 AND E911 SERVICES⁵

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon each Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.⁶ Absolute complied with these conditions before the effective date of the *Lifeline Reform Order*.

Absolute will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Absolute customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access

⁵ See Compliance Plan Public Notice at 3.

⁶ See *Lifeline Reform Order*, ¶ 373.

will be available using the Companies' wireless service from Absolute handsets, even if the account associated with the handset has no minutes remaining.

The Companies' existing practices currently provide access to 911 and E911 services for all customers. The Companies meet these obligations using Telecom Service Bureau, Inc. ("TSB") as its underlying network provider/carrier, which resells the wireless services of Sprint. Sprint routes 911 calls from Absolute's customers in the same manner as 911 calls from Sprint's own retail customers. To the extent that Sprint is certified in a given PSAP territory, this 911 capability will function the same for the Companies. The Companies also currently enable 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Companies transmit all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Absolute will ensure that all handsets used in connection with its wireless Lifeline service offering are E911-compliant. In point of fact, the Companies' phones have always been and will continue to be 911 and E911-compliant. Absolute uses phones from TSB and Sprint that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE⁷

A. Policy

Absolute complies with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Companies are designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135%⁸ of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, Absolute will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

Most of Absolute's customer enrollment is done in-person, as opposed to over the phone or the Internet. Absolute holds planned events at tent locations and other advertised locations. In addition, employees or agents ("Company personnel") may set up in specific neighborhoods at public areas where eligible customers are likely to be located. All enrollments are done electronically in real-time using the CGM, LLC enrollment application. Company personnel views each potential customer's

⁷ See Compliance Plan Public Notice at 3.

⁸ 150% in some states where applicable.

government-issued photo identification⁹ and proof of eligibility to participate in the Lifeline program. The Company's agent then logs into CGM's enrollment application using a unique agent ID and password to enroll the customer using the process outlined in this Compliance Plan. The CGM enrollment application captures a potential customer's identification and photo of proof of eligibility. The customer checks off each certification and signs the application form electronically. The information collected from the customer is entered into the Melissa Database to validate the address and is checked against a CGM-run database of all TSB-managed companies to guard against duplicate enrollments, in addition to the NLAD. A Quality Control employee will then access the app, using CGM's "Real Time Review" to approve the potential customer. To complete the order, the customer must activate the phone and service. An electronic Lifeline application form is also attached to the account.

When the completed order is approved, the agent provides a handset to the customer and assists the customer to activate the phone. The customer must dial 611 and press 1 to activate. The customer will then be required to enter the last four digits of his or her SSN. To activate the phone successfully, the SSN provided over the phone must match the last four digits that the customer provided at enrollment. The agent then assists the customer to make a test call using the handset. Customers are given a Frequently Asked Questions document that lists the Company's name, contact number and customer service information and describes how customers can check their account balance and

⁹ It is Absolute's current policy to view government-issued photo identification, however, that is not a requirement of the FCC's Lifeline rules and the National Lifeline Accountability Database ("NLAD") includes a Third Party Identity Verification component that serves the identity verification purposes. Therefore, Absolute reserves the right to modify its policy with respect to identity verification.

purchase “top up” minutes. In addition, Absolute uses its compliance partner CGM to perform a “back-end” duplicate screen across TSB clients prior to seeking reimbursement from the federal USF fund (“Fund”) to ensure that Absolute has no duplicate customers with its affiliated ETCs or non-affiliated TSB clients.

For enrollments conducted over the phone and online, customers will be required to submit copies of their government-issued photo identification and proof of eligibility to the Companies by regular mail, fax or electronic mail (scanned version) before the applicant will be enrolled.

As discussed in further detail in Section I.F. below, all Company personnel that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, including a compliance manual.

If Absolute cannot determine a prospective subscriber’s eligibility for Lifeline by accessing income databases or program eligibility databases, Company personnel will review documentation establishing eligibility pursuant to the Lifeline rules.¹⁰ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required

¹⁰ See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.¹¹ Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.¹²

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information.¹³ If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber

¹¹ See *Lifeline Reform Order*, ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

¹² *Id.* and section 54.410(c)(1)(i)(B).

¹³ See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

must present the same type of documentation covering three consecutive months within the previous twelve months.¹⁴

For those potential customers that register for Lifeline service in person, Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.¹⁵ In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The Companies will not retain a copy of this documentation, except where state laws or rules require such retention.¹⁶ Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Absolute will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel. In addition, there will be a secondary check by someone that is not compensated on a commission basis for enrollments to oversee and finalize every Lifeline enrollment prior to activating the Lifeline service¹⁷ and including that customer on an FCC Form 497 for reimbursement.

Further, Absolute will not enroll customers at retail locations where Absolute does not have an agency agreement with the retailer. Absolute will require an agent retailer to

¹⁴ See *id.*

¹⁵ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

¹⁶ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹⁷ See *Lifeline and Link Up Modernization and Reform*, WC Docket No. 11-42, Order, DA 13-1441 (June 25, 2013) (revising Section 54.410(a) of the Commission's rules).

have any employees involved in the enrollment process go through the standard Absolute training process, same as it would for any other agent. By establishing agency relationships with all of its Company personnel, including future retail outlets, Absolute meets the “deal directly” requirement adopted in the TracFone Forbearance Order.¹⁸

The Commission determined in the Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because “the Commission has consistently found that ‘[l]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.’”¹⁹ Because Absolute is responsible for the actions of all of its employees and agents, including those enrolling customers in any Absolute owned or affiliated retail locations, and Absolute will conduct a secondary review by someone that is not compensated on a commission basis to oversee and finalize every Lifeline enrollment prior to Lifeline service activation and including that customer on an FCC Form 497 for reimbursement, the Company will always “deal directly” with its customers to certify and verify the customer’s Lifeline eligibility.

De-Enrollment for Ineligibility. If Absolute has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Companies will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.²⁰ A demonstration of eligibility

¹⁸ See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket no. 96-45, Order, FCC 05-165, ¶19 (2005).

¹⁹ *Lifeline Reform Order*, ¶ 110.

²⁰ See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form. If a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within five business days. Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Absolute customers can call customer service by dialing 611 from their Absolute handset and no minutes will be used or decremented for the call. Customers can also call (855) 754-2032 from any phone to reach customer service. Live customer service operators can be reached between 8:00am and 6:00pm Monday through Friday, and between 9:00am and 6:00pm Saturday and Sunday (all times Eastern Standard Time).

C. Subscriber Certifications for Enrollment

Absolute will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.²¹ The Companies share the Commission's concern about abuse of the Lifeline program and are thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Absolute customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.²² Applicants that seek to enroll based

²¹ *Lifeline Reform Order*, ¶ 61; section 54.410(a).

²² See Model Application/Certification Forms, included as Exhibit A. See Compliance Plan Public Notice at 3.

on income eligibility will be provided with the Federal Poverty Guidelines by household size as part of the enrollment process. Applicants that do not complete the form in person will be required to return the signed application/certification to the Companies by mail, facsimile or electronic mail. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.²³

Disclosures. The Companies' application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.²⁴

Absolute's applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.²⁵

In addition, Absolute will notify applicants for its prepaid services that the prepaid service must be personally activated by the subscriber and the service will be

²³ See *Lifeline Reform Order*, ¶ 123.

²⁴ See *id.*, ¶ 121; section 54.410(d)(1).

²⁵ See section 54.405(c).

deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.²⁶

Information Collection. Absolute will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient²⁷); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²⁸

Applicant Certification. Consistent with rule section 54.410(d)(3), the Companies will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,²⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer

²⁶ See *Lifeline Reform Order*, ¶ 257.

²⁷ See *id.*, ¶ 87.

²⁸ See section 54.410(d)(2).

²⁹ See *Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize the Companies to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Companies' Lifeline credit. The applicant must also authorize the Companies to release any records required for the

administration of the Companies' Lifeline credit program, including to USAC to be used in a Lifeline program database.³⁰

D. Annual Re-Certification Procedures

Absolute will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.³¹ Further, the re-certification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.³²

Absolute will de-enroll subscribers that do not respond to the annual re-certification notice or fail to provide the required certification.³³ The Companies will send a single written notice explaining that failure to respond to the re-certification request within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the 30 days, the Companies will de-enroll the subscriber within five business days.

³⁰ See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See *id.*

³¹ See *Lifeline Reform Order*, ¶ 120.

³² See *id.*, ¶ 145.

³³ See *Lifeline Reform Order*, ¶ 142; section 54.54.405(e)(4).

E. Activation and Non-Usage

Absolute will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates Absolute's prepaid service via Absolute's website or by calling the Companies' call center.³⁴ For activation of a handset provided to a new customer "in the field," successful applicants are provided a functioning handset and instructed to dial Absolute's customer service number to complete the activation process. Such calls are free of charge to the applicant. To activate a handset provided to a successful applicant by mail, upon receipt of the handset, the applicant must contact Absolute's customer service department and then press 1. Specifically, the customer must call 611, confirming the last 4 digits of their SSN, which must match the SSN provided when the customer first enrolled. The Customer then makes and receives a test call by calling 561-232-3006 to ensure the phone works before they leave the enrollment location,

In addition, for any customers from whom Absolute does not both bill and collect a monthly charge, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days.³⁵ After 60 days of non-use, the Companies will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.³⁶ Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Companies;

³⁴ See *Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

³⁵ Absolute will apply the 60-day non-usage rule to those customers that receive bills from Absolute, but have not paid the bill.

³⁶ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3). Absolute's current practice is to send a notice to subscribers after 30 days of non-usage giving subscribers 30 days to use the service or they will be de-enrolled.

or (4) responding to a direct contact from the Companies and confirming that the subscriber wants to continue receiving the service.³⁷

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and Absolute will not request further Lifeline reimbursement for the subscriber. The Companies will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.³⁸

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Companies have implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the NLAD, Company personnel will emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All Company personnel interacting with existing and potential Lifeline customers undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan.

Further, Absolute has taken a proactive approach to eliminating fraud amongst its agents and representatives. Absolute’s agents are tracked by GPS so Absolute can track

³⁷ See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

³⁸ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

whether they are attending sales events when they submit new customers for enrollment electronically. Absolute conducts quality control “shopping” at its events whereby a Company representative will pose as a Lifeline customer and attempt to enroll in the Lifeline service without being eligible (e.g., without proof of eligibility or by stating that the person has Lifeline service already from another provider).

Database. Absolute will comply with the requirements of rule section 54.404. and will use the NLAD for all enrollments. In all states that have not opted out, the Companies will query the NLAD to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.³⁹

One-Per-Household. Absolute will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household⁴⁰ through the use of its application and certification forms discussed above, database checks and its marketing materials discussed below. Upon receiving an application for the Companies’ Lifeline service, the Companies will search their own internal records to ensure that they do not already provide Lifeline-supported service to someone at the same residential

³⁹ See *Lifeline Reform Order*, ¶ 203. The Companies will also transmit to the NLAD the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, the Companies will update each subscriber’s information in the NLAD within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

⁴⁰ A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

address.⁴¹ If so, and the applicant lives at an address with multiple households, the Companies will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission’s one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant’s household and share in the household’s expenses or benefit from the applicant’s income, pursuant to the Commission’s definition; and (4) the penalty for a consumer’s failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁴²

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant’s understanding of what constitutes “Lifeline-supported services,” and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline.

Marketing Materials. Absolute includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) Absolute Home Phones, Inc.’s or Absolute Mobile, Inc.’s name (the

⁴¹ See *Lifeline Reform Order*, ¶ 78.

⁴² *Id.* The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

ETC).⁴³ These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Companies' Lifeline service offering, as well as the Companies' application forms and certification forms.⁴⁴ This specifically includes Absolute's website (www.absolutemobilephones.com) and outdoor signage.⁴⁵ A sample of the Company's marketing materials is included as Exhibit B. Further, the Company's application/certification form will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

G. Company Reimbursements From the Fund

To ensure that Absolute does not seek reimbursement from the Fund without a subscriber's consent, Absolute will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁴⁶

In addition, Absolute will keep accurate records as directed by USAC⁴⁷ and as required by new section 54.417 of the Commission's rules. For example, Absolute will keep the following records for each subscriber's individual Lifeline account, among other records, if applicable and as permitted: 1) date that Absolute queried the duplicates

⁴³ See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

⁴⁷ See section 54.407(e).

database; 2) date and information that Absolute transmitted to the duplicates database; 3) date of transmission of updated customer information to database; 4) date and database upon which the ETC determined income-based eligibility where available; 5) date and documentation/data source used to determine income-based eligibility if no database was available to determine subscriber eligibility;⁴⁸ 6) date, database, and program on which ETC determined subscriber eligibility; 7) date and records detailing the documentation a subscriber provided to demonstrate Lifeline eligibility; 8) state Lifeline administrator documentation of customer eligibility, and subscriber's certification of eligibility; 9) date of customer service activation; 10) application/certification and annual re-certification forms for each subscriber associated with a date and time of signature; and 11) date of transmission of customer de-enrollment to database.

H. Annual Company Certifications

Absolute will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that Absolute: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁴⁹ (2) is in compliance with all federal Lifeline certification procedures;⁵⁰ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁵¹

⁴⁸ Such documentation includes the documentation listed in Section I.B. *supra*.

⁴⁹ See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

⁵⁰ See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

⁵¹ See section 54.416(a)(3).

In addition, the Companies will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).⁵² Further, as discussed above, Companies will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁵³

The Companies will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,⁵⁴ the company names, names of holding companies, operating companies and affiliates, and any branding (such as a “dba” or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁵⁵ Absolute will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low-income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁵⁶ Finally, if Absolute is designated as an ETC in the federal jurisdiction states, the Companies will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Companies are able to function in emergency situations.⁵⁷

⁵² See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

⁵³ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁵⁴ See section 54.422(c).

⁵⁵ See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

⁵⁶ See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

⁵⁷ See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

I. Cooperation with State and Federal Regulators

Absolute has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Companies will:

- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Companies have a reasonable basis to believe⁵⁸ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

II. Description of Lifeline Service Offerings⁵⁹

The Companies will offer their Lifeline service in the states where they are designated as an ETC⁶⁰ and throughout the coverage area of Absolute's underlying provider, Sprint. The Companies' wireless Lifeline offering in Arkansas, Nevada and Puerto Rico will provide customers with an option of 100 or 250 anytime prepaid minutes per month at no charge. The minutes for the 100 minute plan are automatically rolled over for 90 days. The minutes for the 250 minute plan do not roll over. Three texts equals one minute for these plans.

⁵⁸ See section 54.405(e)(1).

⁵⁹ See Compliance Plan Public Notice at 3.

⁶⁰ Absolute Home Phones, Inc. dba Absolute Mobile is a provider of wireless services in Nevada and Arkansas. Absolute Mobile, Inc. is a provider of wireless services in Puerto Rico.

Lifeline customers can purchase additional bundles of minutes in denominations of 100 minutes (\$5.00), 225 minutes (\$10.00), 500 minutes (\$20.00) or unlimited minutes (\$30.00). Subscribers with data capable handsets can also purchase data in denominations of 128 MB (\$5.00), 256 MB (\$10.00), 512 MB (\$20.00) or 1 GB (\$30.00). “Top-Up” minutes and data expire 30 days from the date of purchase. Airtime “top-up” minutes and data are available for purchase over the phone and on the Company’s website. Additional information regarding Companies’ plans, rates and services can be found on its website (www.absolutemobilephones.com).

In addition to free voice services, the Companies’ Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting and Voicemail. All plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁶¹

Financial and Technical Capabilities. Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission’s Lifeline service requirements.⁶² The Compliance Plan Public Notice requires that carriers’ compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier’s prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline

⁶¹ See Compliance Plan Public Notice at 3.

⁶² See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Absolute is owned in its entirety by Joseph Fernandez. Absolute has been providing telecommunications services since February 2009 and began providing Lifeline service in 2010 (wireline) and 2011 (wireless). Mr. Fernandez has acquired a controlling interest in several wireless ETCs: Easy Telephone Services Company dba Easy Wireless; Assurance Home Phone Services, Inc. dba Surety Wireless; and Safari Communications, Inc. Easy Wireless is a wireless ETC designated in Arkansas, Kentucky, Missouri, and Oklahoma Surety Wireless is a wireless ETC designated in Arkansas, Maryland and Missouri. Safari Communications was a wireless ETC designated in Maryland, but the ETC is withdrawing its compliance plan and exiting the Lifeline business. Safari Communications surrendered its ETC designation as of November 2014. While Absolute and its ETC affiliates do have some overlap in state ETC authority (Easy, Absolute Mobile and Surety Wireless are ETCs in Arkansas and both Easy and Surety Wireless are ETCs in Missouri), the companies have been and will continue to use CGM to screen for duplicate enrollments, in addition to utilizing the NLAD.

Absolute is also affiliated through common ownership with TSB, which is an MVNE and not an ETC. Absolute's other non-ETC affiliates are G5 Real Estate Holdings, LLC; High Tech Communications, Inc.; Mobile Management, Inc.; Pay It forward Consulting, LLC and BreakOut Wireless, LLC.⁶³

⁶³ Breakout Wireless was formerly known as Woot Wireless, LLC.

Absolute has not and will not be relying exclusively on Lifeline reimbursement for the Companies' operating revenues. As discussed in Section II *supra*, Absolute offers Lifeline and non-Lifeline wireless services, including top-up minutes and data services. Absolute receives revenues from these services and also has access to capital from its investors. Absolute's owner also owns TSB, a substantial MVNE that provides wholesale wireless minutes to ETCs and non-ETC MVNOs, and back office and management services to Lifeline ETCs and non-Lifeline MVNOs. Absolute has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁶⁴ Absolute certifies that it will comply with the service requirements applicable to the support it receives.⁶⁵ The Companies provide all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which they are designated as an ETC. Absolute's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Companies' wireless service offerings provide their customers with a set number of minutes of use for local service at no charge to the customer. The Companies' current Lifeline offerings include packages in Section II *supra* that can be used for domestic calls.

Absolute also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will

⁶⁴ Compliance Plan Public Notice at 3.

⁶⁵ 47 C.F.R. § 54.202(a)(1).

comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Companies will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Companies will not provide toll limitation service ("TLS") for their wireless service offering. Absolute Mobile, like most wireless carriers, does not differentiate domestic long distance usage from local usage. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁶⁶

IV. Conclusion

Absolute submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Companies respectfully request that the Commission expeditiously approve this Compliance Plan.

Respectfully submitted,



John J. Heitmann
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Suite 400
Washington, D.C. 20007
(202) 342-8544

***Counsel to Absolute Home Phones, Inc.,
and Absolute Mobile, Inc.***

February 19, 2015

⁶⁶ See *Lifeline Reform Order*, ¶ 230.

Exhibit A



Wireless Lifeline Service Application and Certification

Return With Proof

AR

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Absolute Mobile's (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer Application Information:

First Name Middle Initial		Last Name		Date of Birth (MM/DD/YY)	
				/ /	
Residential Address w/ street name & Apt Number (PO Box cannot be accepted)				City / State / Zip Code	
Billing Address (if different from Residential Address) (P.O. Box IS sufficient)				City / State / Zip Code	
<input type="checkbox"/> Residential Address is Permanent (Must Choose One) <input type="checkbox"/> Residential Address is Temporary				<input type="checkbox"/> Service Is New (Choose One) <input type="checkbox"/> Service Is Conversion	
Last 4 Social Security Number or Full Tribal Number		Home Telephone / Contact Number		Email Address	
- -		() -			

Would you like to receive texts or emails from our company about new service offerings or promotions?

☐ Yes ☐ No This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ YES ☐ NO

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

- | | |
|---|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guideline |
| <input type="checkbox"/> Federal Public Housing Assistance Section 8 (FPHA) | <input type="checkbox"/> Bureau of Indian Affairs (BIA) General Assistance |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Tribally Administered TANF (TATNF) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | <input type="checkbox"/> Head Start (income-eligible only) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> National School Lunch Program's free lunch programs |

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)

1	2	3	4	5	6	7	8	Each add'l person
\$15,889	\$21,505	\$27,121	\$32,737	\$38,353	\$43,969	\$49,585	\$55,201	+ \$5,616/person

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

☐ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

Tribal eligibility:

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

Multiple households sharing and address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature:

Date:

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: ____/____/____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Bureau of Indian Affairs General Assistance (BIA)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ Tribally Administered TANF (TATNF)
- ☐ Head Start (meet income qualifying standards) (Tribal)

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
- ☐ Prior year's statement of benefits (Last 4 Digits _____)
- ☐ Notice letter of participation (Last 4 Digits _____)
- ☐ Other official document evidencing participation:

Type: _____ Last 4 Digits _____



Wireless Lifeline Service Application and Certification

Return With Proof

NV

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Absolute Mobile's (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer Application Information:

First Name Middle Initial		Last Name		Date of Birth (MM/DD/YY)	
				/ /	
Residential Address w/ street name & Apt Number (PO Box cannot be accepted)				City / State / Zip Code	
Billing Address (if different from Residential Address) (P.O. Box IS sufficient)				City / State / Zip Code	
<input type="checkbox"/> Residential Address is Permanent (Must Choose One) <input type="checkbox"/> Residential Address is Temporary				<input type="checkbox"/> Service Is New (Choose One) <input type="checkbox"/> Service Is Conversion	
Last 4 Social Security Number or Full Tribal Number		Home Telephone / Contact Number		Email Address	
- -		() -			

Would you like to receive texts or emails from our company about new service offerings or promotions?

☐ Yes ☐ No This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ YES ☐ NO

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

- | | |
|---|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guideline |
| <input type="checkbox"/> Federal Public Housing Assistance Section 8 (FPHA) | <input type="checkbox"/> Bureau of Indian Affairs (BIA) General Assistance |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Tribally Administered TANF (TATNF) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | <input type="checkbox"/> Head Start (income-eligible only) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> National School Lunch Program's free lunch programs |

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)

1	2	3	4	5	6	7	8	Each add'l person
\$15,889	\$21,505	\$27,121	\$32,737	\$38,353	\$43,969	\$49,585	\$55,201	+ \$5,616/person

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

☐ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

Tribal eligibility:

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

Multiple households sharing and address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature:

Date:

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: ____/____/____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Bureau of Indian Affairs General Assistance (BIA)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ Tribally Administered TANF (TATNF)
- ☐ Head Start (meet income qualifying standards) (Tribal)

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
- ☐ Prior year's statement of benefits (Last 4 Digits _____)
- ☐ Notice letter of participation (Last 4 Digits _____)
- ☐ Other official document evidencing participation:

Type: _____ Last 4 Digits _____



Wireless Lifeline Service Application and Certification

Return With Proof

PR

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Absolute Mobile's (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer Application Information:

First Name Middle Initial		Last Name		Date of Birth (MM/DD/YY)	
				/ /	
Residential Address w/ street name & Apt Number (PO Box cannot be accepted)				City / State / Zip Code	
Billing Address (if different from Residential Address) (P.O. Box IS sufficient)				City / State / Zip Code	
<input type="checkbox"/> Residential Address is Permanent (Must Choose One) <input type="checkbox"/> Residential Address is Temporary				<input type="checkbox"/> Service Is New (Choose One) <input type="checkbox"/> Service Is Conversion	
Last 4 Social Security Number or Full Tribal Number		Home Telephone / Contact Number		Email Address	
- -		() -			

Would you like to receive texts or emails from our company about new service offerings or promotions?

☐ Yes ☐ No This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ YES ☐ NO

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

- | | |
|---|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guideline |
| <input type="checkbox"/> Federal Public Housing Assistance Section 8 (FPHA) | <input type="checkbox"/> Bureau of Indian Affairs (BIA) General Assistance |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Tribally Administered TANF (TATNF) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | <input type="checkbox"/> Head Start (income-eligible only) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> National School Lunch Program's free lunch programs |

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)

1	2	3	4	5	6	7	8	Each add'l person
\$15,889	\$21,505	\$27,121	\$32,737	\$38,353	\$43,969	\$49,585	\$55,201	+ \$5,616/person

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

☐ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

Tribal eligibility:

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

Multiple households sharing and address:

- ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

- ☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

- ☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature:

Date:

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: ____/____/____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

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Type: _____ Last 4 Digits _____

Exhibit B



Receive a FREE Cell Phone

And up to
250 FREE MINUTES if
you qualify for the
Lifeline government
assistance program!

NO CONTRACT
NO CREDIT CHECK
NO FEES

Your package plan comes with up to 250 anytime minutes that update each month on the customer activation date, as well as VOICEMAIL, CALLER ID and CALL WAITING at no additional cost.

You are eligible if you receive any of the following assistance:

- Federal Public Housing Assistance
- Supplemental Nutrition Assistance Program
- Medicaid
- Low Income Home Energy Assistance Program

**www.AbsoluteMobilePhones.com
877-318-9563**

- Supplemental Security Income
- National School Lunch free program only
- Temporary Assistance for Needy Families
- Income at or below 175% of Poverty Level

Lifeline is a non-transferable government assistance program limited to one discount per household. Only eligible consumers may enroll. Proof of income or program participation is required. Absolute Home Phones Inc is the eligible telecommunications carrier.

Don't Qualify for Lifeline?

Ask about our low monthly-prepaid plans!

Call NOW and we'll get you started!

Mr. John Doe
123 Main Street
Las Vegas, NV 89101

